

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re: Clearview AI, Inc. Consumer Privacy
Litigation*

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)
) Case No. 1:21-cv-00135
)
)
) Hon. Sharon Johnson Coleman
)
)

**CLEARVIEW DEFENDANTS' SECOND SUPPLEMENTAL RESPONSES TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendants Clearview AI, Inc. ("Clearview"), Hoan Ton-That, Richard Schwartz, Rocky Mountain Data Analytics LLC ("Rocky Mountain"), and Thomas Mulcaire (collectively, "Clearview Defendants") hereby provide these supplemental responses to Plaintiffs' First Set of Interrogatories ("Interrogatories").

PRELIMINARY STATEMENT

The Clearview Defendants hereby incorporate all of their General Objections from their July 1, 2021 Responses and Objections to the Interrogatories. This response is made pursuant to an agreement with Plaintiffs, *see* Clearview Defendants' August 19, 2021 letter (the "Letter"), and does not constitute a waiver of any objections the Clearview Defendants previously raised to the Interrogatories.

RESPONSES

INTERROGATORY NO. 8

Identify with specificity all sources from which you have obtained any image included in your Face Template Database and the date range during which you obtained images from each source.

RESPONSE: The Clearview Defendants object to this Interrogatory as overbroad, unduly burdensome, and impracticable to the extent it seeks a specific date range, "all sources," and information related to "any image."

Subject to and without waiver of the General and Specific Objections, and as set forth in the Letter, the Clearview Defendants agreed to respond to this interrogatory by providing an estimate of the approximate number of URLs from which Clearview has collected photographs. The Clearview Defendants state that Clearview's database of photographs includes photographs from approximately 8 to 12 billion URLs.

INTERROGATORY NO. 9

State the total number of images in your Face Template Database and the total number of images constituting "Blocked Illinois Photos" as that term is used in paragraph 36 of the Declaration of Thomas Mulcaire in Opposition to Plaintiffs' Motion for a Preliminary Injunction (Dkt. 43-1).

RESPONSE: The Clearview Defendants object to this Interrogatory as overbroad, unduly burdensome, and impracticable to the extent it would require the Clearview Defendants to create code and/or manually determine the number of "Blocked Illinois Photos."

Subject to and without waiver of the General Specific Objections, the Clearview Defendants state that, as of the date of these responses, Clearview's database of photographs contains approximately 10 billion images.

October 29, 2021

Respectfully submitted,

By: /s/ Precious S. Jacobs-Perry
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Attorneys for Defendants Clearview AI, Inc.,
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Mountain Data Analytics LLC, and Thomas
Mulcaire

VERIFICATION

Pursuant to 28 U.S.C. § 1746, I, Thomas Mulcaire, General Counsel of Clearview AI, Inc., state under penalty of perjury that the foregoing responses to Plaintiffs' First Set of Interrogatories to All Defendants are true and correct to the best of my knowledge, information, and belief.

Executed: October 29, 2021

New York, New York

Thomas Mulcaire

Thomas Mulcaire

CERTIFICATE OF SERVICE

I certify that on October 29, 2021, I caused a true and correct copy of the foregoing document to be served by email on interim lead counsel.

By: /s/ Precious S. Jacobs-Perry
Precious S. Jacobs-Perry